

OFFICE OF THE COMPTROLLER OF THE CURRENCY
OMBUDSMAN
PRIVACY IMPACT ASSESSMENT

A. Contact Information

- **Name of system/application:** Ombudsman Major Application
- **Office of Responsibility:** The Office of the Ombudsman

Contact information of the person completing this document, (Name, title, organization and contact information):

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Information Technology Services
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- **Contact information of the System or Program Manager, (Name, title, organization and contact information):**
Kathryn Kaplan
E-Business and Customer Services Manager
The Office of the Ombudsman
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B. Qualification Questions:

- 1) Does this system collect any personal information in identifiable form about individuals?
Yes
- 2) Does the public have access to the system? **No**
- 3) Has a Privacy Impact Assessment (PIA) been done before? **No**
- 4) Has it been at least three years since the last PIA was performed? **N/A**
- 5) Has the system changed since the last PIA was performed? **N/A**

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C. Data in the System/Application

- **Describe the information to be collected, why the information is being collected, the intended use of the information, and with whom the information will be shared.**

A Major Application that provides a vehicle for national banks and the public to submit their concerns regarding banking practices or OCC regulatory decisions and a repository of the submission and mitigation information. Individuals in the Ombudsman's office, employees of national banks, and other government agencies view this information. Employees of national banks can only view the information for their bank.

- **What are the sources of the information in the system?**

General public, national banks, and other government agencies.

- **How will the data collected from sources other than Federal agency records or the individual be verified for accuracy?**

No individually identifiable personable information is collected from entities outside the Federal Government or the individuals.

- **Who will have access to the data and how is access determined?**

Access is determined on a need-to-know or role basis for OCC employees. National Bank access is granted through the OCC Network Infrastructure GSS, based on the approval of the Bank Trusted Agent, who has been assigned by the national bank's management.

- **Describe the administrative and technological controls that are in place or that are planned to secure the information being collected.**

The Ombudsman major application has management, operational, and technical controls in place to secure collected information. Some of the areas of protection include: Rules of Behavior, Security controls, Security Awareness Training, Physical and Environmental controls, Production Input/Output controls, Contingency Planning, Data Integrity controls, Identification and Authentication controls, and Logical Access controls. Refer to the Ombudsman Security Plan for further detail on protection controls.

- **What opportunities will individuals have (if any) to decline to provide information or to consent to particular uses of the information?**

Privacy Act information collected from members of the public is addressed by the enrollment procedures for the Ombudsman major application and dictates consent in regards to information sharing between OCC and other agencies. Human Resources policies address what rights OCC employees have to decline or access the information they provide.

- **What is the life expectancy of the data and how will it be disposed of when it is no longer needed?**

The life expectancy of the data varies by application and in some cases, is governed by federal statutes or regulations.

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- **Does the collection of this information require a new system of records under the Privacy Act (5 U.S.C. § 552a) or an alteration to an existing system of records?**
No.

The Following OCC Officials Have Approved this Document:

_____	<u>XX/XX/2004</u>
SIGNATURE	DATE

_____	<u>XX/XX/2004</u>
SIGNATURE	DATE